REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-5 and 7-12 remain pending in this application. No amendments have been made to the claims. For the reasons stated below, Applicant respectfully submits that all claims pending in this application are in condition for allowance.

In the Final Office Action, claims 1, 3-5, 7 and 9-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over McIntosh (U.S. 2003/0171119) in view of Serbetciouglu et al. (U.S. Patent 5,719,918) and further in view of Papadopoulos et al. (U.S. Patent 6,978,156); and claims 2 and 8 were rejected under 35 U.S.C. §103(a) as being unpatentable over McIntosh in view of Serbetciouglu and Papadopoulos, further in view of Lam et al. (U.S. patent 6,782,276). To the extent these grounds of rejection might still be applied to claims presently pending in this application, they are respectfully traversed.

The presently claimed invention is directed to methods and systems for routing messages, and in particular, foreign initiated messages that are routed using the SS7 protocol. In the claims, an intermediary receives a request to route a message (typically an SMS message). Conventionally, such routing requests are received by a telecommunication carrier's infrastructure including a home location register (HLR) and associated mobile switching center (MSC). In the claimed invention, on the other hand, the routing request is received by an intermediary that "appears" like the conventional infrastructure, but where, in fact, no such infrastructure exists. As a subset of the steps that the intermediary must perform to appear as,

e.g., an MSC to the third party from which the request was received, the intermediary's response to the routing request must include an International Mobile Subscriber Identity (IMSI) value (see, e.g., paragraph [0032]). In accordance with the express limitations in the claims, this IMSI value is dynamically created and is based, at least in part, on the carrier to which the message is to be routed. For example, as explained in paragraphs [0032] and [0037], the dynamically created IMSI value is generated using the mobile country code (MCC) and mobile network code (MNC) of the destination carrier. In other words, the IMSI value is based, at least in part, on the carrier to which the message is to be routed (i.e., the destination carrier), as expressly recited in the claims.

At least one advantage of this scheme is explained in paragraph [0039] of the specification. Moreover, the created IMSI value is "allowable" and "routable" in terms of compliance with a SRIForSM message and a follow-on FSM message, where these messages are transmitted over SS7.

With the foregoing in mind, it is clear the cited Papadopolous reference does not disclose or suggest creating an IMSI value as required by the claims. Papadopolous describes a methodology in which a subscriber identity module (SIM) includes a rule for calculating from the already-stored identity (IMSI) at least one further identity (or new $IMSI_w$). This may be desirable to create multiple identities for a single wireless device (e.g., for business or for private use, etc.). The disclosed calculation method is to add the value "1" to the original IMSI, i.e., increment the value of the original IMSI. As a result, the generated IMSI value in Papadopolous is not at all related to, and has nothing to do with, a carrier to which a given message is to be

routed (i.e., the destination carrier, or "the carrier to which the second mobile station subscribes"). If anything, the generated IMSI value is related only to the subscriber's own carrier, and has no relation to the destination carrier to which a message might subsequently be sent. Indeed, when the new IMSI value in Papadopolous is created, there need not even be a pending routing request. The IMSI value creation process in Papadopoulos is therefore entirely independent of a destination carrier and, as such, the IMSI generated in accordance with Papadopolous cannot be "based, at least in part, on the carrier to which [a] message is to be routed," as required by the claims.

Since none of the other references relied upon disclose anything regarding dynamic IMSI creation, Applicant respectfully submits that the claims pending in this application are allowable.

Furthermore, in the case of claim 11, it is expressly recited that a gateway interface of the intermediary is configured to create the artificial IMSI value based, at least in part, on the associated (or destination) carrier. Papadopolous only describes how to generate a new IMSI value on a SIM card of a mobile phone. There is no suggestion this functionality can be ported to the virtual MSC disclosed by Serbetciouglu. Claim 11 should thus be allowable over the prior art of record for this addition reason as well.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

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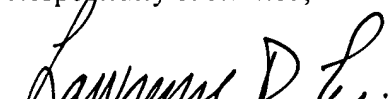
Respectfully submitted,

Date: January 31, 2007

By: 

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Attachments: None.

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